

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Service Rules and Procedures to Govern)	
the Use of Aeronautical Mobile Satellite)	IB Docket No. 05-20
Service Earth Stations in Frequency)	
Bands Allocated to the Fixed Satellite)	
Service)	

June 27, 2005

**Comments of the Satellite Users Interference Reduction Group
(SUIRG)**

Introduction

The Satellite Users Interference Reduction Group (SUIRG) is a global industry membership organization dedicated to combating the increasing and costly problem of satellite radio frequency interference (RFI). Comprised of representatives from both private industry and the public sector, SUIRG shares and disseminates RFI information and remedies, works with industry to define equipment standards and proficiency training, and actively pursues programs to reduce or mitigate satellite interference.

Incorporated as a non-profit trade association, SUIRG combines the collective strength and technical capability of its international member base to achieve what no single company can do alone regarding the mitigation of the growing problems of satellite interference. SUIRG's Founding Members are Intelsat, PanAmSat, Inmarsat, New Skies Satellites, QinetiQ, and Glowlink. Full membership is comprised of 32 organizations which include 14 international satellite operators plus several users and satellite equipment suppliers.

SUIRG hereby respectfully submits to the Commission the following comments relating to the Notice of Proposed Rule Making in the above-referenced proceeding.

SUIRG's Comments

As a general introductory comment, SUIRG fully supports the goal to protect existing FSS operators from harmful interference from AMSS stations as the interference problem is steadily increasing. Satellite operators expend millions of dollars annually specifically related to the incidents of satellite interference and any future FSS networks need to consider their impact to the overall interference problem.

SUIRG supports the concept of enabling passengers and crew to access high-speed internet services; however, everything possible must be done to protect existing and future FSS services from increased interference.

SUIRG recommends that the proposed licensing program concerning the AMSS services should include a means to identify the geo-location of each AMSS earth station and this information should be made available in a database accessible by the general public.

Regarding the concern about mispointing of AES terminals, SUIRG supports the proposal that the AES operators should be required to maintain pointing accuracy within 0.2 degrees.

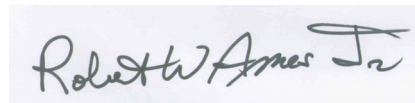
SUIRG support the proposal that AES terminals that use closed loop tracking of the satellite signal need to employ an algorithm that is resistant to capturing and tracking adjacent satellite signals and that AES terminals would have to immediately inhibit transmission when they detect that unintended satellite tracking has happened or is about to happen. SUIRG would like to add that everything possible must be done to protect existing and future services from interference in excess of the current limits.

SUIRG fully supports the proposed requirement for tracking AES terminals and having the capability of suspending/terminating their operational license for repeat interference offenders. In addition, SUIRG fully supports the proposal to add identification capability coded within the signal carrier to quickly identify any offending terminal via a common database of identification codes. Identifier database must be easily accessible by all satellite operators and should be maintained by a third-party to reduce any concerns of partiality. Trial period must be included in the system layout to work out any algorithm problems.

Further, SUIRG proposes that, being the industry umbrella organization whose main mission is the reduction of satellite interference, SUIRG be the ideal entity to be tasked with maintaining the proposed database. SUIRG is willing to take this responsibility if provided with the relevant necessary funding.

Respectively submitted
Satellite Users Interference Reduction Group, Inc

By: _____

A handwritten signature in black ink, reading "Robert W. Ames Jr.", is placed over a light gray rectangular background. The signature is written in a cursive, slightly stylized font.

Robert W. Ames Jr.
President/CEO
Satellite Users Interference Reduction Group
PO Box 512548
Punta Gorda, Florida USA
33951-2548